

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE**

BUTCH LAWS,

Plaintiff,

v.

BOBBY BROOKS,  
LIEUTENANT STARLA BARRY,  
TAMMY REGAN,  
SERGEANT STACEY ENGLAND,  
SERGEANT JOSH SMITH,  
and ROBERT SEXTON,

Defendants.

CIVIL ACTION NO.: 3:20-CV-214

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**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

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Come now the defendants, Bobby Brooks, Lieutenant Starla Barry, Tammy Regan, Sergeant Stacey England, Sergeant Josh Smith, and Robert Sexton (collectively “the Claiborne County defendants”), by and through counsel, pursuant to Federal Rule of Civil Procedure 56 and applicable caselaw and hereby move this honorable court for an order granting these defendants judgment as a matter of law. For cause, the Claiborne County defendants state that there are no genuine issues of material fact and that they are entitled to judgment as a matter of law for the following reasons:

- a. **The Claiborne County defendants are entitled to qualified immunity because the plaintiff is unable to establish that these defendants violated his Eighth amendment rights as outlined in his complaint; and**
- b. **The plaintiff failed to exhaust the jail’s grievance procedure as required by the Prison Litigation Reform Act.**

In support of this motion, the Claiborne County defendants rely on the attached statement of material facts, memorandum of law, and exhibits.

Wherefore, the Claiborne County defendants respectfully request that the court grant their

motion and dismiss them from the cause of action as a matter of law.

Respectfully submitted:

/s/ Federico A. Flores  
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Federico A. Flores - 029806  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 3, 2020, a copy of the foregoing Motion for Summary Judgment was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

Butch Laws  
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Hawkins County Jail  
117 Justice Center Drive  
Rogersville, TN 37857  
Pro Se

/s/ Federico A. Flores  
Federico A. Flores, BPR # 029806